

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-mj-00048-SMM

UNITED STATES OF AMERICA

v.

DANIEL SCOTT CROW,

\_\_\_\_\_ /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
2. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No

Respectfully submitted,

JUAN ANTONIO GONZALEZ  
UNITED STATES ATTORNEY

By:

\_\_\_\_\_  
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AO 91 (Rev. 11/11) Criminal Complaint

AUSA Christopher H. Hudock

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

DANIEL SCOTT CROW,

*Defendant(s)*

Case No.

22-mj-00048-SMM

FILED BY scn D.C.

May 18, 2022

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - Fort Pierce

## CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2020-May 22, 2020 in the county of St. Lucie, Martin, and Broward in the  
Southern District of Florida, the defendant(s) violated:*Code Section*18 U.S.C. § 2422(b)  
18 U.S.C. §§ 2251(a) & 2*Offense Description*Enticement of a Minor  
Production of Visual Depictions Involving Sexual Exploitation of Minors

This criminal complaint is based on these facts:

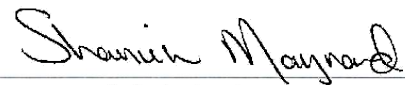
-SEE ATTACHED AFFIDAVIT-

☒ Continued on the attached sheet.*Complainant's signature*

HSI Special Agent Brian Ray

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by videoconference.

Date: May 18, 2022City and state: Fort Pierce, Florida*Judge's signature*

Shanik M. Maynard, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT OF  
BRIAN RAY, SPECIAL AGENT  
HOMELAND SECURITY INVESTIGATIONS**

I, Brian Ray, after being duly sworn, depose and state:

1. I am a Special Agent employed by Homeland Security Investigations (HSI), having been so employed since March 2003. From 2001 to 2003, I was employed by the U.S. Customs Service as a Special Agent. From 1994 to 2001, I was employed as a deputy sheriff in Florida. From 1985 to 1994, I served as a U.S. Air Force Security Policeman. I have been assigned to the investigation of cases involving the sexual exploitation of children. These investigations have included the utilization of surveillance techniques, undercover activities, the interviewing of subjects and witnesses, and the planning and execution of search and arrest warrants. I have received formal training on the aforementioned investigations at the Federal Law Enforcement Training Center, HSI Cyber Crimes Center and at Internet Crimes Against Children Conferences.

2. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 United States Code. That is, I am an officer of the United States, who is empowered by law to conduct investigations of and make arrests for, offenses enumerated in Title 18, United States Code, Sections 2251, 2252, 2422, *et seq.*

3. I have participated in investigations involving pedophiles, preferential child molesters, and persons who collect and/or distribute child pornography, along with the importation and distribution of materials relating to the sexual exploitation of children since 2002. I have completed the Treasury Computer Forensic Training Program's Basic and Advanced Computer Evidence Recovery courses. I have completed Mobile and Cellular Device Data Extraction and Analysis Training, provided by the HSI Cyber Crimes Center. I am currently assigned as an HSI computer forensic examiner. While conducting investigations, I have observed and reviewed

examples of child pornography. I have assisted in numerous child pornography and child exploitation investigations, which have involved reviewing examples of evidence in all forms of media including computer media and have discussed and reviewed these materials with other law enforcement officers.

4. I am conducting an investigation involving the sexual exploitation of children and related activities of Daniel Scott CROW, hereinafter referred to as "CROW". I am familiar with the facts and circumstances surrounding this investigation from my own investigative efforts, as well as from information obtained from other law enforcement officers with personal knowledge of the evidence and activities described herein. Although familiar with the facts and circumstances of this investigation, I have not included each and every fact known to me about the matters set forth herein, but only those facts that I believe are necessary to establish probable cause to believe that Daniel Scott CROW violated Title 18, United States Code, Section 2422(b) (Enticement of a Minor) and Title 18, United States Code Sections 2251(a) & 2 (Production of Visual Depictions Involving Sexual Exploitation of Minors).

5. In July 2019, the victim was a 16-year-old female when she met CROW while taking an Alaskan cruise with her family. CROW was an employee aboard the cruise ship and the victim was a passenger. According to the victim, they exchanged dates of birth and contact information while they were on the cruise. The victim reported staying in contact with CROW and developing a romantic relationship.

6. The victim reported first engaging in sexual activity with CROW in January 2020 when she was 17 years old. The victim, who turned 18 in October 2020, provided consent for HSI to search her iPhone, which had been replaced during the course of her relationship with CROW.



7. The earliest records of conversations using the WhatsApp application between CROW and the victim began in March 2020. On March 14, 2020, at 8:56 AM, CROW directed the victim, "No vibrator or panties for 24 hours". At 1:24 PM, CROW asked the victim, "Wyd", which is text abbreviation for, what are you doing. The victim replied she was driving. CROW asked, "Rubwearing panties?". The victim replied no and CROW texted, "Good girl... next stoplight, prove it". The victim replied with three photographs displaying her vagina while seated in the driver's seat of a vehicle. CROW replied, "Good girl", followed by, "Perfectly done".

8. On March 15, 2020, at 2:05 PM, CROW sent the first photograph of his face documented in the WhatsApp chat. CROW went on to send numerous other identifiable photographs of his face using WhatsApp.

9. On May 17, 2020, at 8:05 PM, CROW asked the victim how many more days until she turned 18 years old. The victim replied with the number of days until her birthday in October 2020. At 8:42 PM, CROW typed, "Hmm... we have to come up with another plan... waiting (redacted)days isn't going to work... I'm going to pop", followed by, "Make a suggestion". The victim replied, "So u wanna pop my cherry earlier?". CROW typed, "No... alternative plan. I'm saving your virginity for 18". At 8:59 PM the victim typed "Anal?". CROW replied, "Hm... what else". The victim then went on to describe possible bondage scenarios.

10. On May 18, 2020, at 11:04 AM, the victim informed CROW that she would be taking a shower. CROW replied, "Make videos!!", followed by, "Start with getting naked". At 11:44 AM CROW typed, "Show me something", followed by, "VERY horny today". The victim responded with three nude photos, including one close up photo of her vagina. CROW typed, "That's my girl". The victim then sent three more photographs lasciviously displaying her vagina. CROW responded,

“Good girl”, followed by “Shower time, yet?”. The victim told CROW the shower would be later. At 12:08 PM, CROW typed, “Want to be inside your ass sooo bad”, followed by, “Want to cum inside you and watch/film it drip out”. CROW told the victim to make “tentative” plans to travel to Stuart, Florida the following day. The victim said she could not wait, and beginning at 4:13 PM, sent four videos to fulfill the previously requested nude shower videos. At 10:34 PM, CROW advised that meeting the following day did not look possible.

11. The victim continued to send CROW sexually explicit material, which CROW would acknowledge with encouraging remarks. On May 21, 2020, at 1:51 PM, CROW typed, “Any luck w hotels?”. The victim advised she was encountering Covid restrictions. CROW responded, “I can’t spend the night, but we can spend the whole afternoon together- is that ok?”. After the victim said, “Yeah”, CROW typed, “Ok- going to book one now will u be able to spend whole afternoon w me?”. The victim indicated she would. At 5:32 PM, CROW sent the victim the address of the hotel, the Hampton Inn & Suites Stuart-North located at 1150 Northwest Federal Highway, Stuart, Florida. CROW told the victim they should meet at noon.

12. On May 22, 2020, at 9:42 AM, CROW typed, “When are you headed this way?”. After the victim responded, CROW added, “Can u stop at cvs and get personal lubricant?”. The victim said she would. At 11:45 AM, CROW advised he was checked into the hotel. The next message from CROW was at 8:25 PM and read, “You keep doing better and better”.

13. On April 28, 2022, I served a summons on Hampton Inn & Suites Stuart-North, requesting records regarding reservations for CROW during the month of May 2020. The response from Hampton Inn & Suites Stuart-North revealed CROW made a reservation for May 22, 2020, via

the Priceline website. CROW checked in and was assigned room number 414, providing a Visa card, number XXXX XXXX XXXX 9693 for incidental expenses.

14. On April 30, 2022, CROW was referred for inspection after arriving at the Philadelphia International Airport from the London International Airport, aboard American Airlines flight AA 737. CROW was informed his iPhone would be detained for a border search. CROW declined to provide his password to facilitate the search. CROW's identification and cards from his wallet were photocopied during the inspection. On May 2, 2022, CROW's iPhone and the photocopies were shipped to HSI Fort Pierce to complete the border search. I noted that among the photocopied cards, CROW was carrying a Visa debit card bearing his name and the number XXXX XXXX XXXX 9693.

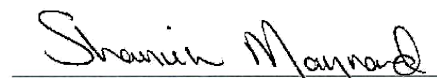
15. On May 5, 2022, HSI Fort Pierce gained access to CROW's iPhone and located a 13 minute and 21 second video of the victim performing oral sex on CROW. According to date and location metadata from the video, the video was made on May 22, 2020, at the Hampton Inn & Suites Stuart-North, 1150 Northwest Federal Highway, Stuart, Florida. CROW's iPhone also contained WhatsApp chats with the victim while the victim was under 18 years of age. There were numerous other images and videos depicting child pornography of the victim on CROW's seized iPhone.

16. Based on location data recovered from CROW's iPhone, during the May 17, 2020 to May 22, 2020 timeframe, CROW was located in Martin and St. Lucie counties when he solicited sex and child pornography from the victim.

17. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that Daniel Scott CROW has violated Title 18, United States Code, Sections 2422(b) (Enticement of a Minor) and 2251(a) & 2 (Production of Visual Depictions Involving Sexual Exploitation of Minors).  
FURTHER SAYETH YOUR AFFIANT NAUGHT.

  
\_\_\_\_\_  
Brian Ray  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me in accordance with the requirements of Fed. R. Crim.  
P. 4.1 by video-conference, this 18th day of May 2022.

  
\_\_\_\_\_  
Shaniek M. Maynard  
United States Magistrate Judge

